



Texas Aero Engine Services Limited
A joint venture between Rolls-Royce & American Airlines
FAA Repair Station XE5R2130

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ORIGINAL

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United States Department of Transportation Dockets
400 Seventh Street, S.W.
Room Plaza 401
Washington, D.C. 20590

RE: **Docket No FAA-19994836 - 52**
Notice No. 99-09

Please consider this a Request for Extension of Time for Comments to the above referenced Docket under 14 C.F.R. §11.29(c).

Petitioner, Texas Aero Engine Services, L.L.C. (TAESL), is a Repair Station (XE5R2130) certificated under 14 C.F.R. Part 145. TAESL is located in Fort Worth Texas and has in excess of 450 personnel involved in the inspection and repair of various Rolls-Royce turbine engines.

At the present time the petitioner has not had the resources available to properly review and analyze the cost impact of the proposed rule on our facility. Several areas of concern that we feel will impact our cost of doing business are the additional requirements placed on the repair station for monitoring work accomplished by non-certificated sources, development and maintenance of capabilities lists and the requirement for mandatory inspections on an all contracted maintenance.

The petitioner seeks the extension of time for comments in order to provide the non-certificated sources a copy of the proposed rule and, in turn, allow them time to review the notice and to provide their comments. In addition, petitioner seeks the extension for the purposes of thoroughly defining the cost impact to the business unit.

In addition to the above, petitioner believes that just cause exists to extend the comment period to the maximum allowable on the basis of the FAA's own observation in the notice that this proposed rule has been under consideration since 1975. The proposal contains many changes to the requirements for the certification of a repair station that must be carefully considered prior to finally comments being submitted.

Finally, it is felt that since it has taken twenty-four years to reach this point that the public will not be given another opportunity to provide input and comment on the rules governing repair station anywhere in the foreseeable future. With this in mind, the proposed rule must be able to address future issues in a manner that permits the FAA and the public to rest assured that all concerns and issues are addressed and in the best interest of all concerned. We believe that the current comment period is not sufficient for this purpose.

For the reasons stated, it is in the interest of the FAA and in the public's best interest to provide the maximum amount of time for comments on the proposed rule.

Therefore, petitioner respectfully requests the FAA extend its' comment period, at a minimum, to December 31, 1999.

Sincerely,

Ronald H. Ford
Chief Inspector /
Quality Assurance Manager